REMARKS

This Amendment, submitted in response to the Office Action dated April 5, 2007, is believed to be fully responsive to each point of rejection raised therein. Accordingly, favorable reconsideration on the merits is respectfully requested.

Claims 1-28, and 31-32 are all the claims pending in the application. Applicant has amended claims 1, 17 and 24 to correct a grammatical informality.

I.   Claim Rejections under 35 U.S.C. § 103

Claims 1-28, 31 and 32 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Chang et al. (U.S. Patent No. 2002/0026443; hereinafter "Chang") in view of "Messages and Codes, Version 8, Release 2" IBM Corporation (March 2003) (hereinafter "Messages and Codes").

Claim 1 recites, *inter alia*:

> "...wherein the persistent federated folder has the ability to save a federated search result, to act as a container in a workflow process, and **to act as a container for a set of objects with similar characteristics, and is further stored in a non-transient manner to permit data stored in the persistent federated folder to be queried with a federated query...**"

The Examiner concedes that Chang does not teach this aspect of the claim and cites Messages and Codes at page viii to cure the deficiency. The aspects of Messages and Codes cited by the Examiner disclose that eClient has the ability to organize documents into a single federated folder. In addition, federated folders allow users to store search results in the EIP federated database where users can retrieve them at any time.

However, there is no teaching or suggestion that a federated folder acts as a container for a set of objects with similar characteristics, and is stored in a non-transient manner to permit data stored in the persistent federated folder to be queried with a federated query, as claimed.

Therefore, assuming *arguendo,* Messages and Codes could be combined with Chang, the combination does not teach all of the claimed elements.

Moreover, Applicant submits that the Examiner's motivation for the combination of Chang with Messages and Codes is merely a result of impermissible hindsight upon viewing the Applicant's disclosure.

Chang merely discloses the use of a folder 3 which is a subclass of sequential collection 2. The folder 3 holds document dynamic data objects (DDO's) 28 and folder DDO's 28. Specifically, as shown in FIG. 6 of Chang, the result of a query is a collection 1 of objects containing Dynamic Data Objects (DDOs) 28 inside. A DDO 28 has attributes, with type, value, and properties. The value of an attribute can be a reference to another DDO 28 or XDO 22, or a collection of DDOs 28 or XDO 22s, thus it may form a tree structure. See Chang para. [0077].

Further, Chang discloses that Datastore 9 implements a Digital Library (DL) datastore. It provides Documents, Parts 4 and Folders 31 storage and retrieval mechanisms, as well as query, search, and other document processing features supported by DL. See Chang para. [0302].

However, at no point does Chang teach or suggest that the folders 3 of Chang should be modified to be a federated folder. Specifically, this appears contrary to the programmed operations desired of the folders of Chang, evidencing that the Examiner's reasoning is merely a result of impermissible hindsight.

In addition, claim 1 recites "mapping the <u>persistent federated folder</u> includes a virtual entity mapped to a plurality of entities in the local federated datastores." However, there is no teaching or suggestion that the federated folder of Messages and Codes includes a virtual entity mapped to a plurality of entities in the local federated datastores, as claimed. Further, Chang, page 2, para. [0027] and page 12, para. [0169] merely discloses that a federated datastore can

combine participating datastores in two levels, one of which is mapping the concepts in each data

store to relate to data from one datastore to another. Further, Chang discloses that a schema maps

each individual persistent data item to its underlying representation in the datastore.   However,

there is no teaching or suggestion that mapping a persistent federated folder includes a virtual

entity mapped to a plurality of entities in the local federated datastores, as claimed.

For at least the above reasons, claim 1 and its dependent claims should be deemed

allowable. Further, neither Chang or Messages and Codes, alone or in combination, teach the

aspects of the federated folder as recited in, for example, dependent claims 7-16. To the extent

independent claims 17 and 24 recite similar elements, claims 17 and 24 and their dependent

claims should be deemed allowable for at least the same reasons.

II.   Conclusion

In view of the above, reconsideration and allowance of this application are now believed

to be in order, and such actions are hereby solicited. If any points remain in issue which the

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is

kindly requested to contact the undersigned at the telephone number listed below.

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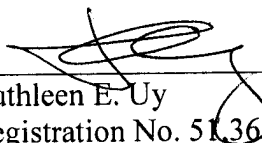
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Respectfully submitted,

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